

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Zurab Kakushadze,)	
A46-132-266)	
Plaintiff,)	
)	07 Civ. 8338 (DCF)
)	
-against-)	ECF Case
)	
MICHAEL CHERTOFF, SECRETARY OF THE)	
DEPARTMENT OF HOMELAND SECURITY)	
)	REQUEST FOR
and)	PRODUCTION OF DOCUMENTS
ROBERT MUELLER, DIRECTOR,)	
FEDERAL BUREAU OF INVESTIGATION)	
Defendants.)	

Pursuant to Federal Rules of Civil Procedure 26 and 34, the Plaintiff hereby requests that Robert Mueller and Michael Chertoff (“the Defendants”) produce the documents listed below within thirty days:

1. Any documents indicating the “hit” or “hits” on Zurab Kakushadze’s FBI name check, with particularity as to who or what caused the purported hit(s).
2. Any and all documents indicating which particular name or names produced a “hit” during the Plaintiff’s FBI name check, if any.
3. Any and all documents indicating the possible name holders’ country of origin, country of birth, date of birth, current address, and/or any other available particularities of this person.

4. Any and all documents maintained by the FBI and USCIS pertaining to the ongoing name check of Zurab Kakushadze, and pertaining to any perceived or proven history of wrongdoing by Zurab Kakushadze.

5. Any documents the Defendants wish to present to the Magistrate Judge in this Mandamus case.

6. Identify any and all witnesses, and provide any and all documents, exhibits, and summaries of other evidence to be presented in court. Designate witnesses whose testimony will be by deposition with a transcript of pertinent testimony if deposition is not taken stenographically at least 30 days before trial unless otherwise directed by court.

In accordance with Local Civil Rule 26.3 and Federal Rule of Civil Procedure 34(a), the term “document” in this request includes, without limitation, electronic or computerized data compilations. The term “document” means every writing or record of every type and description that is in the possession, control or custody of the Defendants.

Dated: New York, New York
May 7, 2008

Respectfully submitted,

Law Office of Jan H. Brown, PC
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Counsel for Plaintiff

